

1884-002
Lee Co.

Chancery Causes: Elbert Lawson vs. John Lawson

Cantrell, Fielding, Delp, Moore, Maness, Johnson, Bledsoe,
Brotherton, Tate, Osborn, Rogers, Morgan, Hobbs

- Deed

CA - Contract Dispute

T - Property
Migration

To the Hon. John A. Kelly Judge of the
Circuit Court of Lee County Virginia

Your orator Elbert Lawson, a resident
of Missouri, humbly complaining sheweth
unto your Hon. that he formerly resided
in the County of Lee where he was
born and raised, that there descended
to him from his father Russell Lawson
deceased, a valuable lot or parcel of
land in said County, known as lot no 7 in the
partition of his said ancestor's land. He
went into the possession of these lands,
and for several years occupied them.
After the lapse of several years he had
reasons sufficient to himself, to suspect
the fidelity of his wife Jeannie Lawson
and in his grief and despair removed
from Lee County to the State of Mo where
he now resides. - after he left he is in-
formed his said wife sued for a divorce
and maintenance and had a decree of your
Honor's Court in her favor, requesting
said lands and setting them apart
for her sole use and benefit, and they
were placed in the hands of a receiver
of this Honorable Court, where as your
orator is advised they now rest -
In the mean time an ungrateful and
profligate uncle of your orator by

Some means unknown to your orator, procured a deed purporting to be a conveyance from your orator, to him the said John Lawson, for said land, this deed bears date the 10th day of December 1878, and was admitted to record in this County on the 30th day of Sept 1881 - The deed purports to have been executed in the State of Arkansas Marion County - A Copy whereof is herewith filed, marked "A" and is prayed to be considered herewith. This pretended deed purports to have been written and executed in consideration of a price paid therefor. Your orator alleges the same to be a foul and willful forgery, gotten up to cheat defraud and ruin your orator. He never signed or executed any such deed, nor did the said John Lawson ever purchase or pay anything therefor. By an inspection of said Copy it will be seen the Clerk purporting to take the acknowledgement of said deed certifies himself as County Court Clerk and attaches the seal of the Circuit Court - Your orator is advised this error or blunder in a very poor forger has rendered said acknowledgement void and of no

effect, and that by the laws of Virginia
a foreign clerk can not take a valid
acknowledgement of lands in this
state and therefore if it had been
done as purports by him it passes
no right from your orator. Besides, as
a fact your orator alleges no such ac-
knowledgement ever was made, but
is false and fraudulent. Your orator is
advised that said John Lawson has
or is about making some compromise
with his said wife Jeannie by which
he is about to possess himself of said
lands, and he fears will make some
sale or transfer under his pretended
deed prejudicial to your orator's rights.
Indeed he is informed the said John
Lawson has been endeavoring to make
sale thereof. Your orator would also
state that his said wife has confirmed his
suspicions and has born children since
his absence, soon thereafter, and is now
an open & known prostitute, and no
longer deserving the beneficent protection
of a court of Chancery. The object
of this bill therefore is to obtain an
injunction against said John Lawson
enjoining and inhibiting him from selling

renting leasing or occupying in any
way said lands until the future order
of this Court. And upon a hearing to
obtain a decree setting aside said
pretended deed exhibit "A" constituting it for
naught & holding it void, and said
lands declared free from the said John
Lawson, as ~~the said John Lawson~~ ~~his~~
~~wife the record such amount were now~~
~~due her and that said lands be forever~~
~~released from her demands.~~

His prayer therefore is that said John
Lawson ~~and Jennie Lawson~~ be made
parties defendants to this bill and answer
its allegations upon oath, ~~that said~~
~~Jennie Lawson answer upon her oath~~
and say whether or not she is not the
mother of children not fathered by your
orator and whether or not she has not
abandoned all the duties and claims of
a wife ~~that the unworthy uncle John~~
Lawson answer upon his oath specifically
How he obtained said deed? Who signed
your orators name thereto? Who attached the
County seal of Marion County Arkansas to the
same? whether or not he did not exhibit
said deed to Abraham Johnson S. S. Maness
and other citizens of this County when the same

has no signature thereto? Whether or not
he has not admitted since its recording
to James H. Moore and various other persons
that said deed was a "Counterfeit" but
that he intended to try to hold said land
under it? And whether or not he ever
granted anything therefor to whom he paid
it and how much when and what in
and that he make full and perfect answer
to each and every allegation of this bill
as fully as if put by way of special
interrogatory - and on a hearing a decree
be rendered setting aside said deed, County
it void, and restoring the same to your
orator free from the claims of John Lawson
and Jennie Lawson. And for all other
just and general relief; May Supra.
issue &c.

A. L. Ponderman P. 2

Virginia Lee County to wit -

This day John M. Tate attorney in fact for
Elbert Lawson personally appeared before
me the undersigned and made oath that
the foregoing facts so far as known to him
are true and so far as made upon inform-
ation of others he believes them to be true.
Given under my hand this March 28, 1882

J. H. Hyatt Clerk

Elbert Lawson

vs. ³
Bill Chay

John Lawson et al

May 28, 1882, Bill killed

Exposition granted in open
court March 29 1882,
1882, May, Sp. Exd. on deft John Lawson
& S. N.

" June O. & conf.

" July court

" Aug cause set for hearing by Dft

" July 1, Decree & court

" Nov order court

1883 M. & Aug & Nov court

1884 Nov & Dec & court

1885. Continued at 2

Co. Clk 1 25
Clk \$10. 22
Sf 15. 00

Const. 1. 00
For notes - James Moore
Witnesses 4. 50

Hardepo. 17. 00
Notary for copy 30

Estimated 50. 47
2. 00
\$52. 47

To the Honorable John A. Kelly Judge of
the Circuit Court of Le County va

The answer of John Lawson to a
bill filed in this Honorable Court against
him by Elbert Lawson.

This respondent saving the benefit
of all exceptions which can or may be had
or taken to said bill upon its final hear-
ing for its many misstatements of facts
and false conclusions of law for answer
thereto, or to so much thereof as he is advised
it is material or necessary for him to
answer, answering says, That it is true
that said Complainant formerly resided
in this (Le) County. It is also true that there
deceased to him from the estate of his
father Russell Lawson a tract or parcel
of land or rather two parcels, and he
supposes that in the partition of the lands
of Russell Lawson died that lot no 7 was
assigned to the complainant, Respondent
also supposes it to be true that said complain-
ant went into the possession of said lands
but as to how many years he occupied the
same respondent is not advised. Nor
does respondent know what reasons Plain-
tiff had for suspecting infidelity on the
part of his wife nor does he know to what

extent the grief and despair caused by
said suspicious influenced his action
in removing from this County, to the wit
Respondent also supposes it to be true, for
he is advised and informed that such is the
facts that Jennie Lawson wife of the said
Complainant brought a suit in this
Honorable Court for divorce and main-
tenance and that a decree was entered
in her favor in said cause setting apart
said lands for her sole use and benefit
and that the same were placed in the
hands of a receiver where they now rest.
Respondent also admits that he is the uncle
of the said Complainant but he denies that
he is either profligate or ungrateful, or that
the means by which respondent obtained
a deed and conveyance to said land are
unknown to the Complainant. But on the
contrary respondent avers that the means
by which said deed of conveyance was ob-
tained are fully known to the Complainant.
He shows that he sold said lands to the
Respondent, he shows that respondent paid
him for them, he shows that he went before
the Clerk of Marion County Arkansas and
executed and acknowledged a deed convey-
ing said lands to respondent, and he further

knows that he directed said clerk to certify
his said acknowledgment of said deed
and he knows that said clerk did so cer-
tify the same in his presence and that
after he had so acknowledged said deed
and the said clerk by his direction had
placed his certificate on said deed, that
he the Complainant delivered said deed
to the respondent as and for his deed,
and said clerk at request of this respondent
then and there enclosed the said deed in an
envelope sealed the same and directed it
to David Lawson a son of this respondent
in whose possession respondent found
said deed when he returned to Virginia
which he did shortly after he purchased
said land. Said ^{and} was executed as it pur-
ports in Marion County Arkansas on
the 10th day of December 1878, and on
that day as stated above was placed in the
Post Office and directed to David Lawson
as aforesaid, and was never in the hands of
respondent after that time until it was de-
livered to him by the said David Lawson.
Respondent will here show your Honor that
at the time of the execution of said deed he was
in Gillsville the County site of Marion County
Arkansas with a load of flour which he

was endeavoring to sell, that he and the said
Elbert Lawson the Complainant left Yellville
together, and remained together a few days
until respondent sold out his horse and
delivered his wagon to the Complainant
as will be hereafter shown in answer to one
of the Plaintiffs interrogatories, that they
then parted respondent proceeding north
home to Virginia. After arriving at home
respondent found that the Plaintiffs wife
had brought her suit before respondent &
that a deed had been entered in her favor
setting apart the rats of said land for
her benefit. Respondent undertakes to
make an arrangement with her by which
he might enjoy a part of the profits arising
from said land, and in his attempt to
make said arrangement he exhibited
and showed said deed claiming said
land, among others to whom he thus showed
it, was Jesse Osborn a Justice of
said County, who upon examination of
it informed respondent that it was
defective in this, that it did not have the
name of Elbert Lawson signed to it
this was the first knowledge information
or even intimation that respondent had
that said deed was defective in any way.

Respondent not knowing what effect this agent
of said deed would have he showed it to several
persons, and asked their opinion about it
and was advised by his friends to return said
deed to the said Elbert Lunsen for his signa-
ture Respondent after receiving this advice
at once enclosed said deed with a letter to
H. F. Cantrell Clerk of Morian County, Ariz.
before whom the same was acknowledged
requesting him, to have said deed signed
by the said Elbert Lunsen, and return it
to Respondent, and in due course of mail
said deed received said deed back with the name
of Elbert Lunsen signed to it as it now
appears. Respondent then files said orig-
inal deed as a part of his annual record
(4) and he avers it to be a genuine deed, he
averts that he purchased said land and paid
the purchase price which he agreed to pay
for it, he avers that said Elbert Lunsen
acknowledged said deed in his presence
before said H. F. Cantrell Clerk of Morian
County, Ariz. and respondent supposes
that everything was done that ought to be done
to make it what it was intended to be, a gen-
uine deed. Respondent is an illiterate
man without any acquaintance with legal
terms and little knowledge of even the requi-
sites of a deed, but he avers that he

now again alleges that said deed was
intended by both himself and the said
Eliot to be a genuine deed and the whole
transaction on his part was bona fide
and made in good faith and he sup-
poses the said Eliot was actuated by
like motives, but since that time he
has perhaps fallen into the hands of
evil counsellors or men actuated it
may be by selfish motives who have
advised him to deny his own solemn
acts and in this way he is trying to
defraud your respondent by nullify-
ing a trade made at his own special
instance and request.

Your respondent denies the allegation
of fraud, practiced by him in the
procurement of the deed aforesaid and
again declares his reception of the same
to have been open, fair, legal, honest
and for a valuable consideration.

In answer to the first interrogatory
propounded by the complainant
your respondent would state as
he has heretofore done, that he ob-
tained the deed from Elisha Larson
who acknowledged its execution before
the Clerk of Placer County, Arkansas.

The answer to the second interrogatory
from Respondent will state that from
his own personal knowledge he
does not know who signed the Com-
plainant's name to the said deed
so he referred it to the said clerk
who took the acknowledgment of the
said deed as heretofore stated in order
that the same might be procured and
when the deed was returned to Respondent
the signature of Elisha Lawson was af-
fixed to the deed here filed.

3.rd Respondent does not know who
attached the seal of the County of
Marion Arkansas to the deed but
supposes the clerk did it, as it was
in his possession on the day of and
at the time of its acknowledgment
by the Complainant, and supposes the
clerk done what was necessary in
the premises, not knowing any thing
about such matter himself.

4.th Respondent did not see said deed
to appear in the County at a time
when the Complainant's signature
was not affixed to the deed, and

Respondent's answer and S. S. Respondent
were during the summer.

5. Respondent claims that he was
admitted to James H. Moore or any
one else that the deed was counter-
feit and that he intended to try
and hold the land under it as invalid
but Respondent did say that he
was told "The said deed was a counter-
feit" but he assented at the time
and contended that the deed was genuine
and if that was not a good
deed, a good deed could not be made
for complainant had stood up
before the clerk and acknowledged
the deed to be good to Respondent,
that it was no fault of his, that
the signature of the said Estate was not
to the deed, but the fault of the Clerk,
as Respondent was ignorant of these
matters and left the whole thing to
the Clerk.

6. Respondent did pay to Complainant
the stipulated price for the said
land in property as here specified,
to wit: one two horse wagon, one black

There, one pair check hind one horse
collar one rifle gun one saddle about
fifty pounds of beef. about one hundred
and fifty bushels of corn and about
six hundred pounds of salt, packed,
which were delivered to the complainant
by this respondent in full pay-
ment and satisfaction for
the said conveyed. The three last
things however were subject to a charge
^{about} of thirty dollars which respondent was
due his brother Dr. Lawson and which
the said Elbert was to pay and then
the claim was to be paid. In answer,
there, collar gun or were delivered
to the said Elbert about 30 miles
south of Jellville the County city of
Marion County Arkansas, and the
other articles were in Perry County County
Missouri on Big Beaver Creek near
Respondent's brother's place where he
has formerly resided.

Having now fully answered
all and singular the allegations
of the said complainant, and
will, your Respondent now state
that the information heretofore
granted including being given

selling, renting, leasing or otherwise disposing of the said land. be dissolved, and your respondents be admitted to all the rights, privileges and immunities conferred by the said deed of conveyance as aforesaid. And upon the dissolution of the injunction, the Complainant be required to pay the costs and damages necessarily incurred in this behalf, and most unjustly expended.

John Lawson.

by
M. D. Hickman

Virginia

Lee County to wit:

appears
personally, This day
John Lawson before me
The undersigned Clerk of the Circuit
Court of the said County and made
oath in due form of law, that the
Matters and things contained in the
foregoing answer are in so far as
they depend on his own knowledge

True, and in so far as they depend
on information derived from
others he believes they to be true.
Given under my hand this
the 1st day of April 1882.

J. A. Hyatt Clerk

The within answer is excepted to, because
it does not respond to the bill in this
particular - It does not state as required
by the interdict "how much he the respondent
paid" It should state the value of the
property"

April 19th 1882

A. L. Oudemore
For Plff.

W. C. O. H.

John L. Landon

John J. Landon

Edwin Landon

Filed in open Court by
permission of the Court

April 1st 1882
J. A. L. Landon
Clerk

Elbert Lawson	Pdff	} In chky
against		
John Lawson	deft	} In chky.
Hagan & Pickens	Pdff	
against		
John Lawson	deft	

There cause
 Came on again this day to be
 read upon the papers formerly
 read - And was argued by Coun-
 sel - And by Counsel of Hagan
 & Pickens, they are to have and
 receive from Commissioner Duncan
 when he shall have made sale
 there of out of the debt decreed
 in favor of John Lawson, and which
 was attached by them, the full costs
 of their said suit, and the sum of
 \$34. and interest thereon from this date
 and when paid the said \$34. shall
 constitute a proper credit on their claim
 against John Lawson in their settlement
 with him - Said Court will then pay over
 to the attorney in fact of Elbert Lawson
 an amount sufficient to pay the costs
 as taxed by the clerk in the case of
 Elbert Lawson against John Lawson &
 heretofore decreed to said Elbert Lawson

And the value being the sum of \$78. the said Commissioner will pay over to Richmond Duncan atty for John Lawson - To effect which Commissioner C.T. Duncan will proceed to execute the order of sale heretofore directed to him - He will report his action to this Court at some future term and the cause is continued.

Albert Lawson
or
John Lawson
Deputy
against
Decree

John Lawson
March 7. 1884

Entered for
March 7. 1884
\$78.00
C.T. Duncan

Enter this
March 29. 1884
J.C.H.

Albert Lawson

Plff.

Against

John Lawson

Def.

} In chancery

This Cause came on this day to be heard upon the bill of the plff, the exhibits filed; the answer of John Lawson ~~the~~ exhibits filed herewith a replication thereto; the depositions of witnesses and the arguments of Counsel.

On Consideration whereof and for reasons appearing to the Court, it is adjudged ordered and decreed that the ~~said~~ paper purporting to be a deed, from Albert Lawson to John Lawson bearing date the 10th day of December, 1878, and now of record in Lee County Clerk's office the said deed is hereby annulled, vacated & set aside, and counted for naught, and that as between the said Albert Lawson and John Lawson the said Albert shall take and hold free from the claims of the said John, the lands in the bill and proceedings mentioned; But the Court further adjudges and decrees that Albert Lawson, pay to John Lawson for the horse & wagon, sold and delivered by the said John to the said Albert in the State Arkansas the sum of \$150, the price agreed by the parties Counsel

But before proceeding to sell hereunder the corn measure
 will first notice for at least 30 days before sale on the
 front door of the court house & in the neighborhood where the
 land lies setting out the time terms & place of sale

to be the value thereof, with legal interest
 thereon from the 10th day of Dec. 1878, until
 paid, and unless the said Albert Lawson
 or some one for him pay the same within
 90 days from the rising of this Court
 then ~~the~~ ^{Chas. T. Benson}
 who is hereby appointed a commis-
 sioner for the purpose will sell so
 much of the land in the bill men-
 tioned as will pay ^{& the expenses & commissions of sale} the same, after
 deducting therefrom the costs of this
 suit which is decreed in favor
 of the plff. He will sell the same by
 public out-cry to the highest bidder on
 some court day at the grant clock of the Court House of Dec. 10.
 a credit of 12 months, requiring 20 or
 much paid in hand as will pay the
 costs of suit & sale; and take bond
 payable to himself ^{with proper security having interest of law} as corn measure for
 the deferred payment; & will report his
 action to this court & the cause is continued.

Albert Lawson

vs
 Decree
 for Sale.

John Lawson
 Aug 2 1882

Entered, Page 286
 J. H. G. 1882

Enter this
 Sept - 1882

Elbert Lawson Plff
 Against
John Lawson Deft } In Ch.

on the motion
of the plff. in cause in open court, in
the reading of the bill an argument of counsel
and due consideration thereof, an injunction
is awarded enjoining and restraining John Lawson
from selling, renting, leasing or occupying
the lands in the bill mentioned until the
future order of this Court, but before the
plff shall have the benefit of said injunc-
tion, he or some one for him shall execute
before the clerk of this court a bond in
the penalty of \$500, conditioned, to faithfully
abide by and duly perform the future orders
of this Court, and to pay to the defendant
John Lawson any ^{costs or} damages that may
be decreed to him by reason of said in-
junction, should the same hereafter be dissolved.

Dr. J. Impacted
Geler-

John Lawson

March 7. 1882

Enter this
March 27 182
at New York

The Commonwealth of Virginia.

To any Justice of the Peace, Notary Public or Commissioner appointed by the Governor of said State, resident in the State of *Arkansas* authorized to take Depositions in the County of *Marion* State of *Arkansas* —GREETING:

Know ye that we, trusting to your fidelity and provident circumspection, do require you, that at such time and place as you shall appoint, to call and cause to come before you

N. H. Cantrell

Witness on behalf of

Elbert Lawson

in a certain

Suit in Chancery

pending in the

Circuit Court of Lee County between

said Elbert Lawson

Plaintiff and

John Lawson

Defendant, and

him

diligently

examine, touching the same in solemn form on oath or affirmation, and having received *his* examination as aforesaid,

that you distinctly, plainly, and without delay certify, sign, and send the same enclosed into our said Court together with

this Writ. Witness, J. A. G. HYATT Clerk of our said Court, at the Court House, this the *5th* day of *June*

1882, in the *106* year of the Commonwealth.

J. A. G. Hyatt, Clerk.

I do solemnly swear that

N. H. Cantrell

whose name

is

mentioned as witness in the commission above

is

a non-resident of the State of

Virginia, so help me God.

Sworn to before me this

5th day of *June*

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Geo M. Tate

J. A. G. Hyatt, Clerk.

Elbert Lawson

vs. } Com. to Take Depo
 }

John Lawson

That Geo. Lawson you will take notice that on
the 12th day of July 1882 at the office of
William Dilling, Notary Public, in Marion
County Arkansas I will forewarn to take the
deposition of R. B. Cantrell whose evidence is
intended to be read on my behalf in a certain
suit now pending in the circuit court of
Lee County Virginia wherein I am Dft. This
you will be kept that if from any cause
the taking of said deposition should not
be convenient or if convenient and not
completed on that day I will adjourn
from day to day until time is
necessarily made the same is complete

Yours very respectfully
Elbert Lawson
My Atty. General

State of Virginia }
Lee County }

I Certify That James M. Moore
Personally appeared before me, and in my
County, and made oath in due form of Law
that he delivered a true copy of the within
notice on May the 29th 1882 to Jno. Lawson.

Given under my official Signature
May the 29th 1882

Jno. M. Tate J. P.

Albert Lawson

vs

John Lawson

In the Circuit Court
of Lee County Virginia

Deposition of Hanner F.
Cantrell taken pursuant
to notice and commission before
William Fielding a Notary Public of
Marion County Arkansas in the office
of William Fielding a Notary Public at
Gillville in the County of Marion and
State of Arkansas on the 12th day of
July 1882

Hanner F. Cantrell a wit-
ness of lawful age after being first
duly sworn deposes and says.

"My name is Hanner F. Cantrell
and my age is twenty eight years
I am Clerk of the Circuit Court
of Marion County and State of Ark-
ansas and ex officio Clerk of the
County Court of the same County
and State. I have been Clerk
for nearly four years past.

I am not personally acquainted
with Albert Lawson, the plaintiff,
nor with John Lawson the defendant
in this cause. I do not remem-
ber to have ever seen John Lawson.

I saw Albert Lawson (or a
person who represented him-
self to be Albert Lawson)

Last February, I do not remember to have ever seen him before that time. I do not remember to have ever taken Elbert Lawson's acknowledgment ^{added to} to any lands in the State of Virginia, either on the 10th day of December 1878 or at any other time, but I cannot state positively that I did not, as I take a great many acknowledgements of deeds, and I might have taken that of Elbert Lawson and have forgotten the transaction.

I never received from John Lawson any deed from Virginia or from any other place not signed by grantor, with my certificate of acknowledgment to it, with instructions to have Elbert Lawson or any other person sign it. I am certain I would have remembered a transaction of this kind, as I have never had any deed returned to me for correction in this way since I have been in office.

I usually take acknowledg-

me to be clerk of the Circuit
Court, but I may have stated
myself, in some acknowledged
manner, to be Clerk of the County
Court of Marion County, Kansas,
as I am Clerk of both
Courts, and the seal of the
Circuit Court is like the seal
of both Courts and the only
one I am required to use

D. F. Cantrell

I, William Fielding a Notary
Public in and for the County
of Marion and State of Kansas
do hereby certify that the foregoing
deposition of D. F. Cantrell was
taken before me and was read to
and subscribed by him in my
presence at the time and place and
in the action mentioned in the caption,
the said Cantrell having been first
sworn by me that the evidence he
should give in the action should be
the truth, the whole truth and nothing
but the truth, and his statements
reduced to writing by me in his
presence, the plaintiff alone being
present by attorney

Witness my hand and official seal
this 12th day of July 1882

William Fielding Notary Public
of Marion County Kansas

Elbert Lawson
vs. Depo. for Plff.
John Lawson et al.

Received, sealed and in
good Condition;
and filed July 21/1882
J. A. Hyatt
Clerk

That you know you will please take notice
that on June the 30th day 1882 at the dwelling
house of Geo. M. Ellis in Lee County Virginia
I will proceed to take the deposition of James
H. Self, James H. Moore and others whose names
are understood to be made on my behalf in
a certain suit now pending in the Circuit
Court of Lee County Virginia wherein I am
Plaintiff and you are Defendants. And if from any cause
the taking of said depositions should not
be convenient or if convenient but not com-
plete on that day I will appear from
time to time and from place to place if
necessary until all are complete.

Yours &c.

Albert Hanson

Key & Atty. General

State of Virginia
Lee County

I certify That James M.
Thorn personally appeared before me and
in my County on May the 29th 1882
and made oath in due form of Law
that he delivered a true copy of the
within notice to Geo. Lawson on May
the 29th 1882

Given under my official Signature
May 29th 1882

Geo M. Lee J.P.

Geo M. Lawson, Locality.
in S. and South. side of
No. 3 No. 1000
John Lee, Secy - - -

the Commonwealth of Virginia,
vs. W. C. Johnson, Constable of said County.
Exhibits: -

We command you to summon
John Johnson to appear before
me, on the 7th day of August 1884,
at the Office of the Clerk of the Clerk of the
District Court of Lee County, Virginia,
for the purpose of showing cause, if any,
he can, why he should not be fined
twenty dollars for failure to attend
and siting in behalf of Albert
Lawson, per John M. Tate, attor-
ney-at-law Plaintiff in a certain
suit now pending in the District Court
of Lee County, wherein John Lawson
is defendant on this day.
And have there there this writ.

Witness my hand this 2nd day
of July 1884, in the 10th year of
the Commonwealth.

John R. West, A.C.

Elbert Lawson per
John M. Tate, atty in
fact vs. Plff

John Lawson Deft } Rule.

August 7th 1882
At Court Clerk's Office.

Executed Aug 3rd
day 1882.

W. B. Bonham Clk

Dwelling house of John M. Tate ag. Lee Co. Va.

June 30th 1882 - 9 O'clock P. M.

Elbert Lawson, per John M. Tate Atty. in fact Plff

vs.

John Lawson - - - - - Defd

In Chancery.

The depositions of James H. Delp, James M. More and others, taken pursuant to notice at the dwelling house of John M. Tate in Lee County Va., and which are intended to be read as evidence in behalf of the Plaintiff in a certain suit in chancery now pending in the Circuit Court of Lee County, wherein Elbert Lawson, per John M. Tate, his Atty. in fact, is Plaintiff and John Lawson is Defendant.

Hiram More, a witness of lawful age, being first duly sworn, deposes and says:

That he heard the defendant, John Lawson, say in the presence of Austin Bledsoe, another witness in behalf Plaintiff, that Elbert Lawson (the Plaintiff) did not sign the deed referred to in Plaintiff's bill, but says the defendant to use his (defendants) own words "I'll beat him on the Certificate"; and in answer to a question from the Plaintiff's Atty. in fact deponent further states, that in his judgment, at the time of the alleged execution by Elbert ^{Lawson} of said deed, the valuation of the real estate conveyed or alleged to have been conveyed, according to

(2)
to the valuation of other lands in vicinity,
was at least twelve hundred dollars,
and in answer to another question of Plain-
tiff, deponent does not believe, that Elbert
Lawson aforesaid could write his own
name, and was exceedingly illiterate
in every respect.

And further this deponent saith not.

Hiram ^{his} ~~More~~
mark

The said James M. More, another witness of
lawful age, being first duly sworn, deposes and
says: - That ~~Elbert~~ Lawson, the defendant,
in the presence of John M. Tate, William Brotherton,
James H. Delf, and other citizens of ~~other~~ County,
in answer to the following question by said
John M. Tate, in words to following effect viz. John,
please state in presence of these boys, whether
Elbert Lawson ever made a deed to you
of the lands alleged to have been made
by him to you? the said John Lawson said
(after some hesitation in replying) about in
these words, Elbert Lawson did not execute
such deed, it was counterfeit, but I'll bear
you on the certificate; and deponent fur-
ther states, that in the presence of said John M.
Tate, and himself, John Lawson said, that
Elbert Lawson was not entitled to justice; and
in answer to question of said atty. in - fact

deponent further states, that he was born and reared in the neighborhood of said Elbert Lawson, went to school with him, and if he was ever able to write his own name legibly, the fact was not known to deponent, who was with him and others a sufficient number of times to have witnessed or learned the same had such fact existed.

And further this deponent saith not.

James, M. More
S. S. Maness, another witness, of lawful age, being first duly sworn, deposes and says:—
Question by Plaintiff's atty-in-fact, John M. Tate. Mr Maness, please state at what time the Deft. John Lawson exhibited to you the alleged deed aforesaid of Elbert Lawson aforesaid, if he did so, ^{and} whether said alleged deed was signed by said Elbert Lawson?

Answer by witness. Mr John Lawson did exhibit it to me what he alleged as a deed from said Elbert Lawson, but as to the exact time he did so, I cannot state; I remember, however, clearly, that the weather was cold, believe it was in the Spring of the year, and not long after Mr ~~John~~ Lawson returned from the West, exact year don't remember; I suppose the object Mr John Lawson had, in exhibiting said deed to me was, to get my opinion as to its validity in this state, after examination I saw that the

~~Albert~~ name ^{of Elbert Lawson} was not to it, or rather to the ~~certifi~~
~~cate~~ deed, told him, I didn't think it a valid deed,
+ Mr John Lawson said it made no difference
as it was in the caption (as he said) of the
~~deed~~ I remember that I said to John
Lawson; altho' the clerk's name is to the Certif-
icate, you see ^{Elbert's name deed} it is not to, and I remember
it was in the morning when we were conversing,
+ I illustrated my position by saying, if I was
to swear it was midnight, would you believe it?
and I don't remember any reply that John
Lawson aforesaid made.

Question by Plaintiff. How long after you saw
the deed without Elbert Lawson's name signed to it
until you saw it with said Elbert Lawson's
name signed to the deed?

Answer by witness. It was a considerable length
time.

Question by Plaintiff. Mr Maness when you did
see said deed, what kind of handwriting
was it in, or rather the signature to deed in?

Answer by witness. It was in a well executed
hand-writing, indicating rather a copy hand.

Question by Plaintiff. Mr Maness you have
been sometime living a neighbor to said Elbert
Lawson, do you believe what was represented
to be his signature was really in his hand-writ-
ing or in the hand-writing of somebody else, in

other words, do you believe it was a forgery?

Answer by witness. said Elbert Lawson was reared within a short distance of me, and I knew him as well as any boy in my neighborhood, and I do not believe that what purported to be his hand writing was really his signature.

Question by Plaintiff. When you advised Mr John Lawson, that the deed was defective in not having Elbe's name to the deed, what did Mr John Lawson aforesaid reply?

Answer by witness. Mr John Lawson replied, that he did not then know where said Elbert Lawson was, that he talked of going to Texas is my recollection; I said to him that I saw no chance for him, but to send said alleged deed back to the Clerk, and have Elbert aforesaid all together, and have the mistake corrected.

And thereupon the Plaintiff turned his witness over to defendant, provided he desires to Cross-Examine.

Question by deft. Mr Maness, I desire to ask you first, was the signature of Elbert Lawson to said deed, in my handwriting?

Answer by witness. I do not believe it was.

Question by deft. Since said answer, the deft. John Lawson says he ^{has} no further question now to ask last named witness.

And further the deponent S. S. Maness saith not.
Sterling S. Maness

Isam Lawson, ⁽⁸⁾ another witness, of lawful age, being first duly sworn, deposes and says: -
Question by Plaintiff. Mr Lawson, are you a brother of Elbert Lawson of whom in this suit John M. Tate is the atty-in-fact - in ~~that sense~~ ^{other words} are you brother of Plaintiff? also?

Answer by witness. I am.

Question by Plaintiff. Will you state whether or not Elbert Lawson can write his name legibly, or so that it can be read scarcely?

Answer by witness. He could not when he left here, and that was a short time before said deed purports to have been made.

And further deponent saith not.

Edham Lawson,

Abraham Johnson, a witness of lawful age, being first duly sworn, deposes and says: -

Ques. by Plaintiff. Mr Johnson please state whether Mr John Lawson, deft, ever exhibited to you a deed purporting to be a deed for his real estate in Lee county, i. e. for Elbert Lawson's estate?

Answer by witness. He did.

Ques. by Plaintiff. Was or not Elbert Lawson's name signed to said deed?

Answer by witness. It was not.

Ques. by Plaintiff. Mr Johnson do you recollect what year, and what time of the year Mr John Lawson exhibited to you said alleged deed?

Answer by witness. To the best of my recollection

it was in the year 1878, it was possibly in the Spring of said year.

Ques. by Plaintiff. Did deft. Mr John Lawson tell you the said deed was made the 10th day of December 1878?

Answer by witness. He did, and I believe that it was in the Spring of 1879 that Mr John Lawson, deft, exhibited to me said deed, after some reflection.

Ques. by Plaintiff. Mr Lawson, how long was it after you saw said deed without Elbert Lawson's signature to it, till you saw said deed with his signature?

Answer by witness. Did not see said deed any more till last winter, after I first saw it.

Ques. by Plaintiff. Did the Certificate of the Clerk and said deed bear same date when you first saw it?

Answer by witness. I do not recollect.

Ques. by Plaintiff. Did Mr John Lawson ever offer to sell to you any portion of the real estate of Elbert Lawson claiming the right to do so under said blank deed?

Answer by witness. He did.

Ques. by Plaintiff. What did Mr John Lawson say to you, when you found this defect in said deed?

Answer by witness. Mr Lawson said it was a good deed.

Ques. by Plaintiff. How long after you saw said deed with the name of Elbert Lawson not signed to it, till it was removed in the country that it was?

Answer by witness. A few days, and said John Lawson told me he had had the said deed fixed up, and proposed to sell to me again, but did not further exhibit said deed to me.

Ques. by Plaintiff. Are you acquainted with the hand-writing of Elbert Lawson, and would you know it, if you see it?

Answer by witness. I have not any time seen his hand-writing, I don't think he can write.

Cross-Examination by Deft. John Lawson: -

Mr Johnson do you believe that the signature to said deed was in my hand-writing?

Ans. by witness. I do not.

And further deponent saith not.

Abraham Johnson

It being now 6 O'clock P. M. and no other witnesses on behalf of Plaintiff appearing
It is ordered that further taking of these depositions be continued till tomorrow morning, at same place, 9 O'clock, A.M. John B. West, A.C.

Dwelling House of John M. Tate Esq

July 1st, 9 O'clock A. M.

Austin Blalock, another witness of
lawful

age, being first duly sworn, deposes and says: -

Question. Mr Bledsoe, did you hear the deft, in this cause say in your presence ~~William~~ Hiram More, that he, the deft John Lawson, relied for success in this cause mainly upon the clerk's certificate to the alleged deed of Elbert Lawson?

Answer by witness. I did.

State what else, John Lawson aforesaid, remarked in connection with said deed at the same time & place, and in presence of Hiram More.

John Lawson said at same time, Elbert Lawson did not sign said deed, I am free to acknowledge; Mr Lawson said this to me as we were on our way to court at Jonesville last month. And further this deponent saith not.

Amos Bledsoe

James M. Delf, another witness of lawful age, being first duly sworn, deposes and says: -

That a conversation took place some time last spring between ^{John M. Tate and} himself, the deft John Lawson, and I was present; the word counterfeit was used, but whether John Lawson said, it is a counterfeit deed, or that it was a counterfeit deed I do not now remember, but he, John Lawson deft, said it is or it was a counterfeit deed, one or the other; and Mr Delf further states, that said John Lawson

then said, the deed was not ^{signed} by Elbert Law-
son when it came here from the West, but
John Tate, if it is a bogus deed or not, I'll
beat you upon the Clerk's Certificate, are
about the words I heard him use; and I
distinctly remember, that John M. Tate (Atty
-in-fact of Elbert Lawson in this cause) did not
hint or suggest, that said deed was coun-
terfeit, the same having been wholly suggested
by the deft. John Lawson.

And further this deponent saith not.

J. H. Delp

William Brotherton, another witness of law-
ful age, being first duly sworn, deposes & says:-
It was in my presence, sometime this last
Spring, that I heard a conversation between
John M. Tate (atty-in-fact for Elbert Lawson
in this cause) and the deft. John Lawson; and
John Lawson used this expression in reference
to the deed referred to in this cause, I ac-
knowledge, it is counterfeit; but, says he,
John Lawson! I'll beat you upon the Certifi-
cate, said the deed was not signed by El-
bert when the deed came here from the West;
but, if it is a bogus deed, he reiterated with
emphasis, John ~~Lawson~~ ^{Tate}, I'll beat you upon the
Certificate; I further state, that the deed being
counterfeit was not suggested or hinted by
said John M. Tate, the word being first used

by the deft. John Lawson; and said John Tate then asked the deft John Lawson, did you send the said deed back to Elbert Lawson aforesaid to have him sign the deed, and deft John Lawson replied, I have not received or sent any mail to that country since I left.

And further deponent saith not.

W^m Bratherton

A fact within the knowledge of the witness Jas. M. More, having an important bearing in this cause & which was accidentally omitted by said More in his deposition on yesterday, upon request & instance of said witness, I herewith attach his statement of the fact referred to, to wit: -

In answer to the question by John M. Tate (during the conversation referred to between said Tate & deft Lawson) did you send said deed back to Elbert Lawson in order that he may sign it? John Lawson replied in effect, I have not received nor have I sent any mail matter to the West since I left there.

John B. West, St. P.

6 O'clock P. M. No other witness appearing, the hour being too late to reasonably expect that any other witnesses will be before me on this day to give evidence, the further taking of these depositions is postponed till Tuesday, July 18th. 1882, at Jonesville, office of the Circuit Court

Clerk of Lee County Va., 9 o'clock A.M.
John B. West, N.P.

Office of the Circuit Court Clerk
Jamestown, Lee County Va., July 18th 1882.
— 2 o'clock P.M.

Robert Dawson, per John M. Tate, Attorney at Law, Plaintiff
against

John Dawson - - - - - Defendant

No witness appearing on this day, the further taking of these depositions is postponed till Saturday, the 29th inst, same time and place.

John B. West, N.P.

Office of Circuit Court Clerk, Lee Co. Va., July 29th 1882.
Robert Dawson, per John M. Tate, Attorney at Law, Plaintiff
against
John Dawson - - - - - Defendant

No witness appearing on this day, and the hour of 6 o'clock P.M. having arrived, the further taking of the depositions, begun on 20th ult, is, on motion of the Plaintiff, postponed till next Monday, the 7th day of August 1882, same place at 9 o'clock A.M.

John B. West, N.P.

Office of Circuit Court Clerk Lee County Va.
August 7th 1882.

Robert Lincoln, for John H. Cole, attorney at law

John Lawson

The deposition of said John H.
Tate, Plaintiff, another witness of lawful
age, being first duly sworn, deposes and
says:

in about these words, Sir, I know the
Seed is a counterfeit-Seed but I am
going to beat you on the Clarke's certificate
I asked Mrs Lawson then, How Elbert
Lawson name came to be signed to the
 deed, whether He (Johns Lawson), sent it
back to the clerk where it- purports to
have been taken and acknowledged, by
mail or otherwise and his answer was
about in these words, Sir, I have had
no mail from the west nor neither have
I sent any since I left, which time he
afterwards said was some time in Dec-
ember 1878. he said he got home about

The 27th day of Dec. 1888. I at another time
interrogated The Defendant about The matter,
and was rebuking The Saide Defendant
for trying to song his own nephew out
of his land, in any such a way, and he
answered me Elbert Lawson is not-entitled
to justice. The land of Elbert-Lawson
that John Lawson Sells to him under his
pretended deed I am acquainted with
have surveyed it all out, and consider it
to be worth \$1000. or \$1200. dollars, in
good close hay.

And further more This Clement Saide
not Aug. 7th 1882

J. M. Tate

Josee Olson, another witness of
lawful age, being first duly sworn, de-
poses and says: - That the defendant
John Lawson exhibited to him the deed
herein referred to, and that he, witness
called his attention to the fact that Elbert
Lawson's name or signature was not
at end of deed in proper place, and
witness told Mr Lawson, that the deed was
no account unless Elbert's signature
was at end of deed & that he could
not make a deed from that one to
another person without having Elbert's

name affixed thereto; and only a few days after said conversation, and a shorter time than the mail could have gone to Arkansas and return, it was rumored in the Country around that Albert's signature was attached to the deed. Witness further states, that the claim of Albert Lawson in the lands, under said pretended deed, he estimates to be worth fifteen hundred dollars, or at least if his property, he would not take less. And further this deponent saith not.

Jesse Ausburn

No other witness appearing on this day and the hour of 6 O'clock P.M. having arrived the further taking of these depositions is, on motion of Plaintiff, postponed till Tuesday the 2^d inst. next, same place, 10 O'clock A.M. John B. West, A.P.

Office of Clerk of Circuit Court
of Arkansas, at the Court House, Ark.
Albert Lawson vs. John M. Tate Plaintiff vs. Defendant
John Lawson

No witness appearing on this day the further taking of these depositions are now closed
John B. West, A.P.

Virginia, Lee County, to wit:—

I, John B. West, a Notary Public in and for said county and state, do certify that the foregoing depositions were taken sworn to, and subscribed before me at the time, place, and for the purpose therein set forth.

Given under my hand this, 2nd day of August 1852.

John B. West. N.P.

John B. West, Notary Public
in and for Lee County, Virginia,
do certify that the foregoing
depositions were taken sworn to,
and subscribed before me at the
time, place, and for the purpose
therein set forth.

John B. West, Notary Public

Filed August 22, 1852.

J. B. West

Notary

Notary, Lee County, Va.

Assessable

Unassessable

and of Taxes and

of 1852

The Commonwealth of Virginia.

To any Justice of the Peace, Notary Public or Commissioner appointed by the Governor of said State, resident in the State of Missouri authorized to take Depositions in the County of Christian State of Missouri —GREETING:

Know ye that we, trusting to your fidelity and provident circumspection, do require you, that at such time and place as you shall appoint; to call and cause to come before you

Elbert Lawson

Witness on behalf of

Elbert Lawson

in a certain *suit in Chancery*
pending in the *circuit* Court of Lee County between said *Elbert Lawson*
Plaintiff and *John Lawson* Defendant, and *him* diligently
examine, touching the same in solemn form on oath or affirmation, and having received *his* examination as aforesaid,
that you distinctly, plainly, and without delay certify, sign, and send the same enclosed into our said Court together with
this Writ. Witness, J. A. G. HYATT Clerk of our said Court, at the Court House, this the *5th* day of *June*
1882, in the *106* year of the Commonwealth.

J. A. G. Hyatt, Clerk.

I do solemnly swear that

Elbert Lawson

whose name

is

mentioned as witness in the commission above

is a

non-resident

of the State of

Virginia, so help me God.

Sworn to before me this

5th

day of

June

1882

pro M. Tate

J. A. G. Hyatt, Clerk.

Elbert Larsson

vs. Com. to take Depo.

John Larsson

1
1
I have to inform you with the notice that on
the 17th day of July 1852 at the office of
J. H. Kead in Christian County Mo. I was
present to take the Deposition of myself and
probably others which Deposition are intended
to be used as evidence on my behalf in
a certain Suit now pending in the Circuit
Court of Lee County Virginia wherein I am
Plt. and you are Def. And if from any cause
the taking of said Deposition or Depositions have
not been commenced or if commenced and not
completed on that day I will resume from
day to day until the same are complete

Yours Respectfully

Albert Lawson

By Atty. General

State of Virginia }
Lee County }

I Certify that James M.
More Personage appeared before me, the undersigned
County, and made oath in due form of Law,
that he delivered to Geo. Brown a true copy
of the within notice, on the 29th day of
May 1882

Given under my official Signature
May 29th 1882

Geo. M. Lee J.P.

Albert Lawson
73
John Lawson

In the Circuit Court of Lee County,
Virginia, in Chancery Depositions
of Albert Lawson and others taken

before me, James H. Bell, a Notary Public
in and for the County of Christian,
in the State of Missouri, pursuant
to notice and commission hereto
arrived at my office in the Court
house, in the town of Ozark,
in said County of Christian and
State of Missouri, on the 17th day
of July, 1882, between the hours
of six am. and until 6 pm. to be
read in evidence in a certain cause
now pending in the Circuit Court
of Lee County, Virginia, wherein
Albert Lawson is Plaintiff and
John Lawson is Defendant
Present: W. H. Pollard, Counsel for Plff;
J. J. Gordon Counsel for Defendant

Albert ^{plaintiff of lawful age} Lawson, being produced, ^{on oath of Plff} and
and after first being ^{and after first being} duly sworn deposed and says:
Some time in the fall of 1877 I
was living in Lee County, Virginia;
John Lawson and Arthur Rogers
induced me to leave Virginia and
come to the State of Missouri;
Some time in the fall of the year
1878, I went to Boone County, ^{Arkansas}
to pick cotton; and some time
just before Christmas of 1878, John
Lawson came to where I was
at work and proposed to take

me back to Virginia: I started
with him and some time just
before Christmas we passed through
the town of Yellville, where we
stayed not more than one hour,
and while there I never left the
wagon and I was not in
any house in the town:
John Lawson left the wagon
and was gone for a while,
but came back and got in
the wagon and drove across
White River that night, a distance
of ten or twelve miles: I went
about one hundred miles further
with John Lawson, when he
wanted to buy a debt that I held
against Arthur Rogers for Two
Hundred and Fifty Dollars for
rent of my lands and not
being when Rogers lived
and considering the debt not
worth much, I sold it to John
Lawson for one wagon, one
horne, and harness or gears for
one horne: John Lawson and
I then parted and I never saw
him any more until about
one week ago: I never sold
my land to John Lawson or to
any one else: I never signed

a deed to my lands in Virginia
before the Clerk of the County of
Marion in the State of Arkansas
conveying to said land to John
Lawson or to any other person;
I never saw the Clerk of Marion
County Arkansas in my life
until about the 14th day of
February, 1882, when I went
there to see about the deed John
Lawson claimed to have for my
lands; I never signed said
deed, nor authorized any one
to sign it for me; I can
not write my name; I always
sign by mark; I can not
read writing; I never sold my
land to John Lawson nor
never agreed to sell it to him.

(Cross examined by Defendants attorney)
I left Virginia in August or
September, 1877; When I left there
I started to go to Missouri; John
Lawson did not leave Virginia
with me; I went to Arkansas
to pick cotton in August 1878;
I went to Boone County Arkansas;
I had been at work in Arkansas
about two weeks when John Lawson
came to me; John Lawson
came to me and wanted me to go

back to Virginia: we started
in about a week and we
started for Jackson Port to get
on a boat: and I got way
down to Iuka, in Arkansas,
and we had a load of flour
and we sold it out and I
took a notion I would not go
any further - and he got at me
to go with him a piece and I
went with him a little beyond
Iuka and I told him I was
going to come back to Fancy County;
I turned around and came back
about four miles and I stopped
and stayed there about a year
and I took a notion to go to
Fulton County: John Lawson
went on; I never proposed to sell
my land to John Lawson for a
certain horse; ~~We~~ went by Yellville
Arkansas to sell some flour: It
is not true that I sold my
land in Virginia to Mr. John
Lawson for one black horse
and a wagon: It is not true
that I acknowledged a deed before
the Clerk of Marion County, Arkansas,
conveying my land to John
Lawson: I did not hold a
flour sack while Mr. Lawson

paid the Clerk for the acknowledgment;
It is not true that Mr. Lawson
paid the Clerk of Marion County,
Arkansas, flour for the acknowledg-
ment; I am not acquainted
with the Clerk of Marion County
Arkansas; John Lawson gave
me a horse and wagon and
gear for the debt on Rogers
and it is not true that ~~they~~
the horse, wagon and gear
went in on the land; I
did not hold Arthur Rogers
note for the debt; I never took
up Arthur Rogers note after
he came to this country; I
did not about the year
1879 state to Daniel Bloomer
that I had sold my land in
Lee County Virginia to John
Lawson for a horse and wagon
and had received the pay for
the same; I told John Lawson
to go to Manns and get the
writings about the debt on
Rogers; I could not say whether
I did or did not state to Ira
Lawson of Taney County, Mo., that
I sold John Lawson my land
in Lee County Virginia; If I
did tell him I had sold my
land in Lee County, Virginia, it

was false; I did not in 1879
tell Arthur Rogers that I had
sold my land in Lee County
Virginia to John Lawson nor
words to that effect; I did not
in the presence of Carter Lawson
in 1879 state that I had sold
my land to John Lawson; I
do not think I stated to Phillip
Roller in Taney County that I had
sold my land in Virginia to
John Lawson; I did not in
the presence of Mr Roller and
Jim Johnson, of Taney County,
state that I had sold my land in
Lee County Virginia to John
Lawson; I am as sure that
I made no statements to the parties
regarding as I am as to the other
facts that I have testified to.

(Re-direct examination by Off. atty.)
It is a fact that Iru Lawson, John
Lawson and others have been at
me and trying to get my land
in Lee County, Virginia for
less than it was worth; It
is a fact that if I told these parties
that I had sold my land in Virginia
it was to get rid of them; I
am not to say acquainted

with the Clerk of Marion
County Arkansas, though I saw
him last February.

(Re-Cross examination by Sifts attorney)
Wm Roller was not trying to buy
my land; Phillip Roller was
not trying to buy my land;
Daniel Bloomer was not
trying to buy my land; Arthur
Rogers was not trying to buy
my land; Ira Lawson did
try to buy my land: If I
told this fact I had sold my
land it was to keep Ira Lawson
from "ding downing" me: Ira
Lawson tried to buy my land
this Spring - in April, 1882.

attest: Jas. A. Bell

Elbert ^{his} Lawson
Mark

Subscribed & sworn to before me this
July 15, 1882, my term expires February
26, 1883. Witness my hand & Notarial
seal.

Jas. A. Bell, Notary Public

John Lawson, a witness of lawful
age being produced in part of
the plaintiff and after being duly
sworn deposes and says:
I left Virginia because I had
been making illicit whiskey;
and the Revenue officers got

after me and I had to leave;
Jim Johnson down on Beaver
in Taney County, wrote the deed
I claim Elbert made me; the
time the deed was written Elbert
was down in Arkansas; Elbert
said he would let me have the
land for a little black horse &
wagon; I let Elbert have little
black horse & wagon, pair of
check lines and one collar
and the remainder of a saddle if
it was found and after Ira Lawson
was paid he was to have my
corn, hogs and fodder; I had
from 40 to 60; Ira was to have
his pay first and Elbert the
balance; I do not know how
much corn I was to let him
have; I had put up about
one thousand bundles of fodder,
but I do not know how much
I had fed and don't know how
much fodder Elbert was to
have; I only delivered to Elbert
horse & wagon and pair of
check lines and collar; I
never heard tell of the note
on Rogers; I never got the note;
I never got the note from Mammis;
I never had an order to Mammis

for a note! I never read the deed
to Elbert! No one ever read
the deed to Elbert Lawson!
I do not know who signed
Elbert's name to the deed!
I did not know it at the
time the deed was made that
Elbert Lawson could not
write! I have learned since
that he can not write! After
we left Yellville we drove
a piece of a day and another
day before Elbert turned back or
left me! After I left Elbert
I went straight back to Virginia!
After I got back to Virginia
I showed the deed to Squire
Lawson and he said there
was something lacking! that
Elbert's name was not signed
to the deed! S. P. Mannus told me
to send the deed back to Yellville
and have the Clerk sign Elbert's
name to the deed! I sent
the deed back to the Clerk at
Yellville! I addressed the deed
to K. F. Cantrell, at Yellville,
Arkansas! I mailed the deed
at Kiles Ford, Hancock County
Tennessee! I did not register
the deed to the Clerk! I sent
the deed to the Clerk in Yellville

before I went to Albany, New York,
I received the deed book at Kiles
Ford; I did not address the
letter to Cantrall; I do not
know who addressed the
letter; I got the letter at home
sealed and do not know what
was in it; I do not know where
the letter containing the deed that
I received at Kiles Ford purported
to be mailed.

Daniel Bloomer, a witness of lawful
age being produced on the part of
the ~~Plaintiff~~ Defendant and after
being duly sworn deposes and
says:

After Elbert Lawson came back
from Arkansas I asked him if
he had sold his land and he
said that he had; He never

stated what he got for it:

(Cross examined by Peffi attorney)
I do not recollect what year
he made this statement: In a
short time after making the first
statement he also told me that
he had not sold the land: He
never told me to whom he
had sold his land.

Daniel Blinn

Subscribed and sworn to before me
this July 17th, 1882, my term expires
Feby 26, 1885. Witness my hand & Notarial
seal.

Jas. R. Bell,
Notary Public

State of Missouri }
County of Christian } ss

I, James R. Bell, a Notary
Public for and within the County of Christian
and State aforesaid, do hereby certify that
the foregoing depositions were duly taken
reduced to writing and signed by the
subscribers respectively before me (with the
exception of John Dawson who was duly sworn
and testified as in the foregoing deposition but
left my office before signing the same) at the
place and time therein mentioned, pursuant
to annexed rules and commission

Albert Lawson
wth Depts for Deft

John Lawson

Received Sealed and in
good condition - and
Filed July 26th 1882.

J. A. Matt
Clerk

In testimony whereof I have hereunto
affixed my hand and Notary
seal at my office in Oyster
Bro. this July 17th, A.D. 1882.
My term expires July 26, 1883.
Jas. R. Bell,
Notary Public

Mr Elbert Lawson or A. L. Pridemore
Attorney for the said Elbert Lawson.

You will please take notice
That on the 31st day of July 1882, at the
dwelling house of Ira Lawson in the
County of Lamy in the State of Missouri
I will proceed to take the depositions of
Ira Lawson Arthur Rogers Caloway
Rogers and others, which depositions
are intended to be read as evidence in
behalf of the defendant in a suit in
Chancery now pending in the Circuit
Court of Lee County Virginia in
which you are plaintiff and I am
defendant, and should said depo-
sitions not be completed on that
day the taking thereof will be con-
tinued from day to day from time
to time and from place to place
until they are completed. You can
attend and cross examine if you
desire to do so.

Yours &c.
John Lawson

~~Robert~~ Lawson

Notice to
ans. ~~3~~ Take de pos.

Robert Lawson

Virginia Lu County Court
This day C. T. Duncan
personally appeared
before me John A. G. Hyatt
Clerk of the Circuit Court
of Lu County Va and
made oath that he deliver
ed a true copy of this
Notice to A. L. Priddy
att. of Robert Lawson
the said Robert Lawson
not being a resident
of the State of Virginia
Given under my hand
This 20th day of June 1882

J. A. Hyatt Clerk

State of Missouri To
Arthur Rogers Esq Lawson
J. Johnson Carter Lawson
Mellie Lawson Post Hole
Wyrane Lawson & Amel Edwards

you are hereby commanded to be and
appear personally before me J. Stout
one of the Justices of the peace
within and for Benton Township in the
county of Boone on the 31st day
July 1882 at the hour of ten
o'clock in the forenoon
of that day at the residence of
Cora Lawson in Bearor Township
to give your depositions in the trial
of a cause wherein Elbert Lawson
is plaintiff and John Lawson
is defendant on the part of the
defendant, and here fail not
at your peril this is my hand this
31st July 1882 J. Stout J. P.

at the risk and the request
of the defendant & party deponent
William M. Allen to serve the within
Subpoena

J. Stout J. P.

Executed the within Surrogate
by reading the same to and in
the presence of the within named
Arthur Hagelbush, Janson, and
John Johnson, Carter Janson and
Miller Janson, Jacob Hopson,
Hyrtim Janson, Samuel Eldorado,
William Mayden
deputy cons.

Countable fees
Each witness 25cts
Doll \$2 00
of fees 35

Depositions & witnesses produced and sworn and examined on the 31st day of July 1882 before the Honorable Judge at Eight o'clock in the forenoon & Six o'clock in the afternoon of that day at the residence of a Lawson in Beaver Township Wagon County Missouri before me J. W. Straub Justice of the Peace Arthur Rogers of legal age being duly sworn questioner for Rodgers State What you know about the land trade of Mr Elbert Lawson and John Lawson. ans all I know is what Elbert told me he said that he Elbert Lawson had sold John Lawson his land and had received a horse & wagon in payment on the land, and if John ever got possession of the land then John Lawson was to pay him Elbert Lawson 5 or 6 Dollars more and if he never got possession of the land he was never to come back on him for the worth of the horse and wagon.

Ques do you owe Mr Elbert Lawson anything

Ans I do not consider that I do.

Ques did John Lawson ever come to you and ask you for a debt that was coming from you to Elbert Lawson

Ans he never did.

Ques after the deed was said to be sent back did you see the Post mark of Greenville Ark on the envelope

Ans I did

Subscribed & sworn to before me 31 day of July 1882 J. W. Straub Justice of the Peace The Peace

Arthur Rogers
a Justice of the Peace
was reduced to writing
at Greenville Ark
J. W. Straub

Edwin Lawson

John Lawson (Mrs Mary Law-
son of lawful age being produced
before and examined on the part of the
defendant John Lawson of the said
State.

Question State your full name?

Ans. Miles Lawson.

Question Where do you live?

Ans. In Taney County Missouri.

Question What is your occupation?

Ans. I am a horse keeper.

Question State what you know about the land trade
between Edwin Lawson and John Lawson?

Ans. Edwin Lawson told me he sold John
Lawson his land and received a horse
and horse, He also stated he went to
Gillville to make the land.

Question Where did this conversation take place?

Ans. In the South part of Taney County near
the Arkansas line.

Question When did this conversation occur?

Ans. On or about September 1880.

Subscribed and sworn to before me this 31 day of

July 1882

at St. Louis

Justice of the Peace

I further certify that the within

deposition was taken, reduced to writing

in my presence at the residence of John

Lawson in Beaver Township in Taney County

Missouri between the hours of 8 o'clock in

the forenoon & six o'clock in the afternoon

of that day H. A. Stout Justice of the Peace.

Ebert Lawson

John Lawson

George H. Morgan
of lawful age being produced. Sworn
and examined on the part of the respondent
John Lawson deposed, and says

Question. What is your name?

Ans. Geo. H. Morgan.

Question. Where do you live?

Ans. I live in Dancy county Missouri.

Question. What is your Occupation?

Ans. I am a farmer.

Question. Tell what you know about the land trans-
action between Ebert Lawson and John Lawson.

Ans. Ebert Lawson told me he sold John La-
wson his land and received a horse
and wagon on the land.

Question. When did this conversation occur?

Ans. in Dancy county Missouri.

Question. About what time as near as you can
remember?

Ans. soon after he returned from Arkansas
some time in the fall of 1881.

Subscribed and sworn to before me this 31st day of
July 1882 at St. Louis

George H. Morgan

Justice of the Peace

I further certify that the within
deposition was taken and reduced to
writing in my presence and reduced
to writing, at the residence of a
witness in Beaver Township in Dancy
county Missouri, between the
hours of 8 o'clock in the forenoon

and six o'clock in the after
noon, ^{of that day}
it is lost ^{in the} water
of the place

Albert Larson

John Larson Job's Hobbs of
Laropul age being produced sworn
and examined, on the part of the de-
fendant John Larson. Deposition And
says,

Question What is your full name?

Ans. Job's Hobbs.

Question Where do you live?

Ans. I live in Tany county Missouri.

Question What is your occupation?

Ans. I am a farmer.

Question State what you know about a land
travels between Albert Larson and John
Larson. This conversation occurred in the fall of 1880.

Ans. Albert Larson told me he received
a horse in payment for the land.

Question Did Albert Larson tell you he went to
Galville to acknowledge the deed.

Ans. He said he went there for that purpose.
Subscribed and sworn,

To before me this Job's Hobbs

31st day July 1882

J. J. Stout Justice of
the Peace

& further certify that the within deposition
was taken and reduced to writing in my
presence at the residence of Ora Larson
in Beaver Township Tany county
Missouri. Between the hours of 8 o'clock
in the forenoon and six o'clock in
the after noon of that day.

J. J. Stout
Justice of the Peace

Albert Lawson

53

John Lawson (Hiram Lawson of
careful age being produced. Given
and affirmed, on the part of the depen-
dent John Lawson, deponent also says.

Question What is your full name?

Ans. Hiram Lawson.

Question Where do you live?

Ans. I live in Christian County Missouri.

Question What is your Occupation?

Ans. Plowing, corn, farming &c.

Question State what you know about the land
trade between Albert Lawson and John
Lawson.

Ans. I know nothing only what I have heard
John and Albert say, and others.

Question State what you heard Albert Lawson
say?

Ans. I heard Albert say he never sold
John the land.

Question What conversation passed between you Mr.
Jonga and Albert Lawson in regard to
the trade.

Ans. Mr. Jonga went to Albert Lawson
and myself & when we all got together
I asked Albert if he had sold John
his land he said he had not. We
or I one asked Albert (I have forgotten
which) if he ever sold his land to
John Lawson and he said he did not. I
remarked that is what you have
always told me, Jonga said to you
you have got a good case.

Question Where did this conversation take place?

Ans. in Christian County Missouri about four

Wells from O'Beart - some time in June
1882.

Question Are you a relation of Albert Lawson?
Ans. I am. Albert Lawson is my
brother.

Question. Have you any pecuniary interest in
the land.

Ans. I have not.

Question. Has he promised you any part of the
land?

Ans. He has not - He promised to pay me
for my trouble in furnishing him
money to go to Yellville to take his
condition and for going to see the
court.

Question How much money did you furnish
him?

Ans. I let him have fifteen dollars at
one time and twenty dollars at another
time.

Question. Did Albert Lawson at any time tell
you that he would give you part of
the land in you and him - I would
it?

Ans. He never promised me any of the land
and only part of the money - He has been commended
and only then after the expenses are
paid. Then would give me half of that
would - I satisfy him. I don't remember
that I told him I would or would
not take it.

Witness Lawson
Subscribed and sworn to before
me on 31st day of July 1882.

J. J. Stout Justice of the Peace

of Yell County Arkansas. The justice of the peace has taken &
returned testimony in my records to the residence of Albert
Lawson at Yellville, Yell County, Arkansas, on the 31st day of July
1882. His power expires on the 31st day of October in the
year 1882. J. J. Stout - Justice of the Peace.

Albert Larson

John Larson } Ma Larson of
lawful age being produced sworn
and examined on the part of the de-
fendant John Larson deponent and says
Question - What is your name?

Ans. Ma Larson.

Question Where do you live?

Ans. I live in Perry County Missouri.
Question What is your Occupation?

Ans. I am a farmer.

Question. State what Albert Larson asked you
for his land in property.

Ans. Albert Larson named to me and said
that he wanted to take his land to
a mare and two female colts. one
suckling female colt. the other about
fifteen months old. He said that
he would give me his land back
younger for the mare and two female
colts. Says I Albert that is not
enough for your land. He says
I will take that for it. that give
(meaning his wife) had a share
in it. that he never expected to
go back any more. And we
traded. I then wrote to the Surveyor
back there. that run this land
out. Albert's land for the courses
of his land. The Surveyor sent me
the courses. when the courses come
I told Albert that. I was not going
to take his land. that it was not
enough for it. and if he was
de minded to give it away. that he

might fool it away to somebody, & be
that his father had worked and
managed. And that I would
be ashamed if I was him to
take any such a price for it,
and he fell out with him because
I would not take it.

Question

Did you ever hear any conversation
between Albert and John Lawson
in regard to the land?

~~the~~

Ans

I have heard them talk about the
trade but paid little attention to
the talk. I was in big creek town-
ship in this county in company with
Albert Lawson & John Lawson and
heard Albert say to John Law-
son, I'm tired of doing without that
land.

Question

What did you think was meant by
that conversation?

Ans

I thought he was getting the team
in payment for the land. As he had
no other means of paying for the team
that I know of. The reason I thought
so John Lawson had told me he was
going to make the trade with him
for his land. I told John Lawson
if I were him I would not do it. Though
he had as well have the land as
any body for he would fool it
away to somebody.

Question

Did you hear Albert Lawson say any-
thing ^{about} a debt between him and Arthur
Rogers.

Ans

Albert said Arthur was owing him
some for some corn & clothing & cow
&c. I think he put the amount at thirty
dollars.

Question Will you hear Albert Lawson anything about
renting his land to Arthur Rogers?

Ans. He said Arthur was either to sell the
rent and send him the money or buy
the rent and send him the money for
it at whatever corn was selling
at. I said to him you want get a
dollar, it will take the rent of that
place to buy up (said) meaning his
wife's interest. This conversation happened on or about the fall of 1898.

Question Will you hear Albert Lawson say
anything about letting John Lawson
have a debt on Arthur Rogers for
rents in payment for a horse and
wagon?

Ans. I did not. I've Lawson
subscribed and
deposited before me
this 31 day of July
1892 J. J. Stobbs,
Justice of the Peace.
I further certify that the within
deposition was taken and reduced
to writing in my presence at the
residence of Eva Lawson in Beaver
Township, Ramsey County, Minnesota
between the hours of 5 o'clock in
the forenoon and six o'clock in
the afternoon of that day.
J. J. Stobbs,
Justice of the Peace.

State of Missouri }
 County of Henry } E. H. Larson

John Larson
 & J. H. Stout one of the justices of
 the Court and for the Township of
 Boone in the County of Henry and
 State aforesaid. hereby certify that the
 above mentioned are the true depositions
 of the person named witnesses, as they
 was taken before me with all papers &
 process, and do further certify that
 said depositions were taken on 31 day of
 June A.D. 1882 at the residence of
 Ora Larson in Beaver Branch in
 Henry County Missouri on the part
 of John Larson, Defendant
 J. H. Stout Justice of the
 Peace

Subscribed in the above entitled cause
 at the Suburban 1 35

Depositions 2, 300 words 15 cts each 100 words

& figures 83 25

Signing each witness 5 cts 8 witnesses 40

Transcription & certificate 35

\$45.50

Witness fees

Wm. Mayden	Arthur Royer	50 cts
Sam. S. Robinson	J. H. Larson	50 cts
25 cts each	Arthur Larson	50 cts
\$2.00	Ora Larson	50 cts
	Willie Larson	50 cts
	Dan. S. Shepard	50 cts
	Robert H. H. H.	50 cts

Depositions taken by John Larson, 50 cts
 & hereby certify this to be a true and
 correct copy of the original

Albert Lawson.

John G. Johnson of
certain age being produced, sworn and
examined, on the part of the Defendant
John Lawson, deponent and says,

Q. State your full name?

A. John G. Johnson

Q. Where do you live?

A. I live in Linn County Missouri.

Q. What is your occupation?

A. I am a Physician.

Q. State what you know about a certain
land tract between Albert Lawson and
John Lawson.

A. By request of John Lawson I wrote a deed
with the covenants of a general warranty for
Albert Lawson to convey to John Lawson
certain lands that are situate in the State
of Virginia. John Lawson told me at the
time that he was going to get Albert
Lawson to go with him to Belvidere Vir-
ginia and there before the County Court
acknowledge the conveyance. Some time
afterward I learned that there was a wrong
in the deed. Albert Lawson returned to me
Lawson and I met him near the residence
of John Lawson and asked him about the
deed. What was wrong with it. He answered
the deed was no conveyance. I told him I knew
the deed was written all right for I wrote
it myself. He answered his name was not
signed to the deed. I asked him how it
appeared his name was not signed to the deed

He said he remembered the clerk forgot it. but
he did not know the address but what his
name was to the Clerk. He said he went to
Belleville for the purpose of signing the deed
and that John Lawson paid him a horse
and wagon on the land but that John
Lawson had cheated him and was the
meanest man in Virginia and that he
did not intend to let him have the
land. This conversation all occurred about the fall of 1880

Subscribed and
Signed to before
me this 31 day of
July 1882

One of the
Justice of the Peace
a further certify that the within
deposition was taken and returned
to writing in my presence at the
residence of Eva Lawson, in Beaver
Township, Taylor County, Missouri
between the hours of 5 o'clock in
the forenoon and six o'clock
in the afternoon of that day

W. D. Pratt
Justice of the Peace

State of Missouri's
 County of Ramey } Thomas A.
 Lupton Clerk of the County Court
 of Ramey County and State of
 Missouri do hereby certify that
 J. J. Stout is an acting justice
 of the Peace, duly commissioned
 and qualified and by the laws
 of the State of Missouri is author-
 ized to take depositions and I
 further certify that his signature
 hereto is genuine

In testimony whereof I have
 hereunto set my hand and offici-
 al seal This the 7th day of August
 1882
 Thomas A. Lupton
 Clerk County Court

John Larsson
 and 3 Depo. for dect

Ellert Larsson

Received sealed &
 filed August 15th 1882.
 J. A. Giffyatt
 Clerk

Bill of cost.
 J. P. fees \$42.53-
 Constables " 2.00
 Witnesses 4.00
 Total \$10.55-

Know all men by these presents That I Elbert
Lawson of the county of Marion in the State
of Arkansas, have this day for and in
consideration of the sum of five hundred
dollars, ^{to the said Elbert Lawson} in hand paid by John Lawson
of the county of Taney in the State of Mis-
souri. granted, bargained and sold, and by
these presents, do grant, bargain and sell
unto the said John Lawson the following
described tracts or parcels of land situate in
the county of Lee in the State of Virginia
that is to say, Beginning on a white oak
on the south side of Newmans Ridge, thence
S. 87° E. 23 poles to a birch and dogwood on
said ridge. S 63° E. 50 poles to a white oak on
the top of a hill N 56° E 44 poles to a stake on
the top of said ridge. N 86° E 47 poles to a
stake in a conditional line made by Ira Lawson
and Obadiab Lawson thence with said line N 10°
W. 125 poles to a white oak called Obadiab Law-
sons corner on the south side of Newmans
ridge S 45° W 92 poles to two poplar trees
near a branch N 22° E 142 poles to two pop-
lar corner of Arthur Rogers land N 85°
W 106 poles to a conditional line made by Arthur
Rogers and Ira Lawson N 72° W 63 poles to a
poplar and Blackoak corner to Arthur Rogers
N 23° W 50 poles to a dogwood near the top
of the ridge S 61° W 80 poles to a hickory and

poplar S 17, E, 60 poles to a poplar and chestnut
S 38, W 82 poles to a poplar and chestnut S 33 E,
100 poles to a poplar on the side of a ridge
thence N 64 E 82 poles to Ira Lawsons fence on
a spur S 20, E, 13 poles to a white oak the
beginning.

Beginning on a Spur on the
west side of a branch N 37¹² W 40 poles to a
burch at the foot of a spur N 46 W 31 poles
crossing a branch to a hickory N 58, E, 67
poles to a black gum and dogwood on a
rocky point N 3 W, 28 poles to a white oak
and small hickory near the top of a ridge
N 48, E, 84 poles to a chestnut oak on the side
of a ridge N 3^E, 42 poles to a buckeye on
the E side of a branch corner to a 34 acre
survey made by J Ferguson thence with a
line thereof S 36, E 26 poles to a red oak S
62, E, 32 poles to two dogwoods and burches
S 30, E, 34, poles to 2 burches N 58, E, 8 poles to
a burch and buckeye S 48, E 10 poles to a
burch N 68, E, 12 poles to a leaning and double
burch. S 45 E 12 poles to an ash and two
dogwoods on the top of a ridge thence
along the top of said ridge with its
several meanderings S 40, W 160 poles to
two post oaks on the top of said
ridge thence due west 38 poles to the
beginning. To have and to hold

the premises hereby conveyed, with all the rights privileges and appurtenances thereto belonging, or in anywise appertaining unto the said John Lawson his heirs and assigns forever. & the said Elbert Lawson hereby ~~conveying to him with the said John~~ Lawson his heirs and assigns for himself, his heirs, executors and administrators to warrant and defend the title to the premises hereby conveyed against the claim of every person whatsoever.

In witness whereof I have ^{hereto} subscribed my name and affixed my seal this
10th day of Decr 1916

Elbert Lawson (Seal)

State of Arkansas }
County of Marion }

Be it remembered that Elbert Lawson who is personally known to the undersigned clerk of the County Court within and for said County of Marion and State of Arkansas to be the person whose name is subscribed to the foregoing deed, as a party thereto, this day appeared before me, and acknowledged that he executed and delivered the same, as his voluntary act and deed for the uses and purposes ^{and consideration} therein contained, and set forth

Given under my hand with seal annexed
this 10th day of Dec 1878.

K. F. Cantrell clerk

Virginia Deed Registry Clerk's office
The foregoing deed bearing date Dec. 10th 1878
between John H. Brown of Marion County, Arkansas
the first part, and John H. Brown of Marion County
Missouri of the second part is recorded. To record
upon the certificate of K. F. Cantrell Clerk of the
County Court of Marion County, Arkansas.

John H. Brown
Dec 10
K. F. Cantrell
recorded in Dec 10
book 10 p 10

4

Received payment
Dec 10

12 now sell unto by these presents That
I Elbert Lawson of the county of Marion
in the State of Arkansas, have this day for
And in consideration of the sum of five hundred
dollars to the said Elbert Lawson in hand
paid by John Lawson of the county of Taney
in the State of Missouri granted bargain
and sold And by these presents, do grant bargain
And sell unto the said John Lawson the following
described Tracts or parcels of land Situate
in the county of Lee in the State of Virginia
that is to say. Beginning in a white oak on the
South Side of Newmans ridge Thence S. 29, E.
23 poles to a bunch ^{And} dogwood on said ridge
S. 63, E. 50. poles to a white oak on the Top of a hill
N. 56, E. 44 poles to a stake on the Top of said ridge
N. 86 $\frac{1}{2}$ E. 47. poles to a stake in a conditional line
made by Ira Lawson And Obediah Lawson Thence
with said line N. 10 $\frac{1}{2}$ W. 125 poles to a white oak
called Obediah Lawsons corner on the South
Side of Newmans ridge S. 45, W. 92 poles to two
poplar stumps near a branch N. 22, E. 142 poles
to two poplars corner of Arthur Rogers' land
N. 85, W. 40. poles to conditional line made by Arthur
Rogers And Ira Lawson N. 72, W. 63 poles to a
poplar And black oak corner to Arthur Rogers
N. 23, W. 50 poles to a dogwood near the Top of the
ridge S. 61, W. 80. to a Hickory And poplar S. 17, E. 60

holes to a poplar and chestnut S. 38, W. 82 holes to
a poplar and chestnut S. 33, E. 100. holes to a poplar
on the side of a ridge thence N. 64, E. 82 holes to
John Lawsons fence on a spur. S. 20, E. 13 holes to a
white oak The Beginning

Beginning on a Lynn on the west side of a branch
N. 37 1/2 W. 40 holes to a burch at the foot of a spur
S. 46, W. 31 holes crossing a branch to a hickory
N. 58, E. 67 holes to a black gum and dogwood
on a rocky point N. 3, W. 28 holes to a white oak and
small hickory near the top of a ridge N. 48, E. 84
holes to a chestnut oak on the side of a ridge
N. 3, E. 42 holes to a buckey on the east side of
a branch corner to a 38 acre survey made by
J. Ferguson thence with a line thereof S. 36, E.
26 holes to a red oak S. 62, E. 32 holes to two
dogwoods and burchus S. 30, E. 34 holes to 2 burchus
N. 58, E. 8, holes to a burch and buckey S. 48, E. 10
holes to a burch N. 68, E. 12 holes to a leaning and
soluble S. 45, E. 12 holes to an ash and two dogwoods
on the top of a ridge thence along the top of said
ridge with its several meanderings S. 40, W. 160
holes to two post-oaks on the top of said ridge
thence due west 38 holes to The Beginning

To have and to hold the premises hereby conveyed
with all the rights privileges and appurtenances
thereto belonging or in any wise appertaining
unto the said John Lawson his heirs and

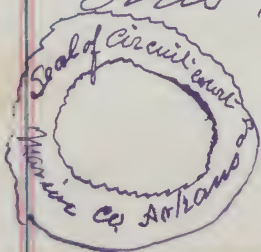
assigns forever I the Saide Elbert Lawson
hereby **covenanting** to **me** with the Saide John
Lawson his heirs and assigns for himself
his heirs executors **and** administrators to
warrant **me** defend the title to the premises
hereby conveyed against the claim of any
person whatsoever in witness whereof I
have hereto subscribed my name and **affixed**
my Seal This 10th day of Dec. 1878

Elbert Lawson **Seal**

State of Arkansas }
County of Marion }

Be it remembered that
Elbert Lawson who is personally known to
the undersigned clerk of the county court
within **me** for Saide county of Marion **and**
State of Arkansas to be the person whose
name is subscribed to the foregoing deed
as a party thereto This day appeared before
me **and** acknowledged that he executed **and**
delivered the same as his voluntary act
and deed for the uses and purposes **and**
consideration therein contained and set forth
Given under my hand with Seal annexed
This 10th day of Dec. 1878

L. F. Comstock clerk



Virginia Lee county courts clerk's office Sep-
The 30th 1881

The foregoing deed bearing date Dec-
30th 1878 between Elbert Dawson of Marion
county Arkansas of the first part and
John Dawson of Lorry County Missouri
of the second part is admitted to record
upon the certificate of E. H. Cantrell
clerk of the circuit court of Marion
county Arkansas.

Teste John M. Gibson, clerk
Secy

John M. Gibson, clerk
of the circuit court

John Dawson
John { Copy of Dec.
Elbert Dawson

Record in Dec-
30, 1878, 473.
John M. Gibson, clerk

"A"

See for this copy 157

Elbert Lawson Plff
 again } In chancery
John Lawson defd } In its Circuit
Court of Lee County Virginia -
The object of this suit is to obtain a
decree from the Circuit Court of Lee
County Virginia in which the cause is
now pending, setting aside a deed
void and holding for naught a deed
purporting to be executed by the plff
to the defendant for the lands em-
braced in said ^{patented} deed, being the lands
which descended from the plffs
father Russeel Lawson deceased and
is situated on the waters of the North
Fork of Clinch river, in Lee County
Va, and whereon the said plff lived
and is now in the hands of the
sheriff of this County as receiver
and which said proceeding affects
only the plff and defendant.

Virginia Lee County court clerk office the 20 day of July 1882
The foregoing is the substance of the proceedings in the
above entitled cause as the same are recorded.

Wm. John R. Gibson clerk

Elbert Lawson

vs J. L. Pender

John Lawson

Recorded in Court

18th May 1876

John A. H. H. H.

Fee for recording 50¢

This deed made this July 29th 1882
between John M. Tate attorney in
fact, of Albert Lawson, of the state of
Missouri of the first part and A. L.
Pridemore of the second part witnesseth
that whereas the said John M. Tate
attorney in fact as aforesaid, has
heretofore employed pursuant to his
powers the said A. L. Pridemore, to
institute a suit in chancery for the
said Albert Lawson against John
Lawson, for the purpose of setting
aside a deed alleged to be a forgery
& fraudulent purporting to be executed
by said Albert to said John Lawson
for certain lands owned by said
Albert in the County of Lee, ^{and state of Va} and the
said attorney in fact not having
any other means to compensate the
said Pridemore for his said services,
hereby in consideration of his having
instituted said suit, and further that he
presents the same to final determi-
nation in the Circuit Court of Lee
County doeth, grant bargain sell
and convey unto said Pridemore
so much of the lands situated in
Lee County as belongs to the said

Elbert Laws, as will pay the said
Pendmore the sum of two hundred
dollar ~~on the~~ to be laid off to him
on the east end of said tract, and
should the attorney in fact and the
said Pendmore disagree as to the
quantity then the same is to be laid
off by commissioners to be mutually
agreed on between them. The said
attorney in fact covenants that he
will warrant specially the lands
so sold or convey as aforesaid as
fully & specifically as his said
power will warrant. For more
specific reference to the meter and
bounds of said lands reference
is here had to the deed or title of the
said Elbert Lawson now of record
in the clerk's office of Lee County
Va. And also to the pretended deed
herin first alluded to which is
also of record in the Clerk's office
of the County Court of Lee County.
Witness the following signature &
seals this day & year first
above written.

Jno. M. Tate

(Seal)

State of Virginia - County of Lee. To wit:

I, John B. West, a Notary Public
for the county aforesaid, in the State
of Virginia, do certify that John M.
Gates (attorney in fact, of Albert
Lawson of the State of Missouri) whose
name is signed to the writing above,
bearing date on the 29th day of July
1882, has acknowledged the same be-
fore me in my county aforesaid.

Given under my hand, this 29th
day of July 1882.

John B. West, N. P.

2. 20 3-0

H. L. Primmer
from } Real
J. M. Tatum & Co.
in fact &c.

Filed July 31st 1882
J. L. Hyatt
Clerk

61 to 25-
" 20-
1.25

actable 50
50
100
50
1.50

H. P. Fox: 50 etc.
charged to said date.

Know all men by these presents that we Albert Lenson
John M. Tate & Sam. Poter are held and firmly bound
unto the Commonwealth of Virginia in the just and full
sum of Five hundred dollars for the payment thereof with
and lawfully to be made to the said Commonwealth and heirs
successors, our heirs executors and administrators jointly and
severally, firmly by these presents, And we hereby receive
the benefit of our homestead exemption as to this bond.
Witness our hands and seals this 30th day of March 1888.
The condition of the above obligation is such that whereas
on the 1st day of March 1882, the above named Albert
Lenson obtained from the Grand Jurors of Lee County, Virginia
an injunction requiring and restraining John Lenson
from selling, renting, leasing or occupying the lands in
the bulk of injunction mentioned, and of the future orders
of the Court, upon condition that he the said Albert Lenson
should execute before the Clerk of said Court a bond in
the penalty of \$5000 conditioned to faithfully abide by and
duly perform the future orders of the said Court &c,
Now if the above named Albert Lenson shall faithfully
abide by and duly perform the future orders of the said Court
and pay to the defendant John Lenson any costs and damages
that may be awarded to him or that he may sustain by
reason of said injunction should the same hereafter be
discharged, then the above obligation to be and otherwise
to remain in full force and effect.

Albert Lenson By Atty in fact

John M. Tate

Sam. Poter

Albert Larson

vs ³/₂ Bond

John Larson

Filed April 1 1889

J. B. Hyatt

clerk

Elbert Lawson for John
Mr. Tate atty in fact
vs³ Bill of costs

John Lawson

The Commonwealth of Virginia,

To the Sheriff of Lee County - - - Greeting :

We Command you to Summon

John Lawson

To appear at the Clerk's office of the Circuit Court of Lee, at the Court-House, on the first Monday in

May next, being rule day to answer a bill in Chancery, exhibited in our said Court against
John by *Robert Lawson*

And have then there this writ. Witness JOHN A. G. HYATT Clerk of our said court at the Court-House
this *29* day of *March* 188*7*; in the *100* year of the Commonwealth.

J. A. G. Hyatt CLERK.

The Commonwealth of Virginia,

To the Sheriff of Lee County . . . Greeting:

We Command you to Summon

John Lawson

To appear at the Clerk's office of the Circuit Court of Lee, at the Court-House, on the first Monday in

May next, being rule day to answer a bill in Chancery, exhibited in our said Court against

him

by

Albert Lawson

And have then there this writ. Witness JOHN A. G. HYATT Clerk of our said court at the Court-House

this *31st* day of *March* 188*2*; in the *106* year of the Commonwealth.

J. A. G. Hyatt CLERK.

Albert Larson vs John Larson is they
on the motion of the plaintiff in this cause in
open Court and the reading of the bill and argument
of Counsel & due consideration thereof an injunction
is awarded, enjoining and restraining John
Larson from selling, renting leasing or
occupying the lands in the bill mentioned,
until a future order of this Court.

Teste J. A. Hyatt Clerk

For Larson

The Commonwealth of Virginia,

To the Sheriff of Lee County - - - Greeting :

We Command you to Summon

John Lawson

To appear at the Clerk's office of the Circuit Court of Lee, at the Court-House, on the first Monday in
May next, being rule d y to answer a bill in Chancery, exhibited in our said Court against

him

by

Albert Lawson

And have then there this writ. Witness JOHN A. G. HYATT Clerk of our said Court at the Court-House

this *31st* day of *March* 1882; in the *106* year of the Commonwealth.

J. A. G. Hyatt CLERK.

Albert Lawson Pet'r In Chancery
vs Def't
John Lawson

On the motion of the plaintiff in this cause in open Court and the reading of the bill and agreement of Counsel & due consideration thereof an injunction is awarded injoining and restraining John Lawson from selling, renting, leasing or occupying the lands in the bill mentioned until a future order of this Court.

Teste J. A. Hyatt Clerk

Albert Lawson
vs
John Lawson
May Rules 1882

Executed by
delivering a copy
of the within to
John Lawson on
this 1st day of March
1882 Thomas J. Ely
for Thomas J. Ely
D. L. C.